April 30, 2003

Ms. Xiao Wu
Environmental Scientist
KDHE/BAR
Air Operating Permits Section
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

Dear Ms. Wu:

The following initial comments/questions are in regard to the proposed Class I Title V air operating permit for Georgia-Pacific Gypsum Corporation located at 2177 Highway 77 in Blue Rapids, Kansas (source ID number 1170021). The EPA would like to note that we do not consider the application or the Statement of Basis to be an integral part of the operating permit. If there is something in the application or Statement of Basis that needs to be in the permit, it must be incorporated (or at least referenced) in the permit itself. Also, please send a copy of the final permit and final Statement of Basis to Gary Schlicht of my staff at the regional office (mail code ARTD/APCO).

A meeting between BAR and EPA (BAR/EPA meeting) was held on March 20, 2003 in Lawrence, Kansas. The meeting was held to discuss potential objection issues regarding this permit. There seems to be some resolution on the major issues. However, these comments will include the issues that were discussed (for the record) along with other miscellaneous comments. Hopefully, these comments with help BAR produce a revised proposed permit that will be agreeable to both parties.

Note also that BAR must keep in mind when reading these comments that different emission units with different limitations can all have the same control equipment (usually a baghouse). Also, it is sometimes difficult to determine whether an emission unit in one section, with no control equipment requirements identified, may have control equipment requirements that are identified in another section. Some of these situations are identified in the comments, but certainly not all. There is a note under comment #7 regarding Section Q, which is a good example of the above. Possible resolutions are also stated as to how to handle these situations.

The comments from EPA-Region 7 on the proposed Title V air operating permit for Georgia-Pacific Gypsum are as follows, with potentially significant comments marked with an asterisk. These comments do not constitute an objection under 40 CFR 70.8(c) at this time.

1) * On page 22, at A (1), there are approximately 148 emission units (EU's) that are subject to K.A.R. 28-19-20 for process particulate emissions. There currently are no

requirements for monitoring or recordkeeping in the proposed permit. The Statement of Basis (SoB) does not adequately justify or rationalize why there are no requirements in the permit. This topic was discussed at the BAR/EPA meeting and several suggestions were made to improve the SoB language. BAR indicated that they would be as specific and as inclusive as possible in the SoB explanation.

If the company supplies the calculations, include them in the SoB. If there are numerous EU's, one can just include calculations for a few of the EU's with the highest emission rates. If they are in compliance, the rest should be also. One could ask the sources to provide these calculations. One could reference a specific dated document in the BAR files which would contain said calculations. One must also consider the margin of compliance for each EU. If the margin is very small, monitoring and recordkeeping should be included for these EU's.

Be aware that this comment does not just apply to this permit. This regulation has been an issue for some time now, going as far back as the Jeffrey permit (September 2000) in which similar comments were made. Memos have been written to BAR on this regulation and comments have been made on other permits regarding this regulation since then. This comment is to be applied to all proposed T5 permits from here on out and also at renewals if not yet addressed.

2) * On page 34, at (I)1, there are approximately 120 EU's subject to K.A.R. 28-19-501(d). All the EU's have control equipment. There are (23) fabric filters and (1) ESP. The rule calls for continuous operation of the control when the EU is operating, development of a maintenance plan and maintaining a log of all maintenance, repairs, etc. This requirement is good for control equipment. However, the permit itself does not contain any monitoring or recordkeeping requirements for these EU's. There appears to be a requirement for monthly opacity observations, but this is not sufficient T5 monitoring for these units to insure compliance.

The source develops the maintenance plan. There are no requirements for the content of the plan. It is not required to be submitted for approval and no one would ever see it except for maybe an inspector if he was so inclined. The plan may or may not contain monitoring and recordkeeping. Even if it did, any Title V monitoring to insure compliance must be included in the permit itself.

This topic was also discussed at the BAR/EPA meeting and suggestions were made as to what kinds of monitoring could be used. The fabric filters and the ESP (CE-005) need adequate monitoring and recordkeeping stated in the permit. Operating parameters for the ESP that could be monitored include primary and secondary voltage, primary and secondary amperage, sparking rate and the number of on-line fields. Any monitoring should be at a frequency that would insure compliance with the opacity and process PM standards. The rappers could be inspected for proper operation at a certain frequency. Records should be kept of all data. The fabric filters could be visually inspected at

regular intervals. Opacity observations could be done more often. The pressure drop could be measured and recorded. Bag leak detectors could be used or fluorescent dye leak checks could be done regularly.

As all fabric filters may differ in size, design and emission limitations, the monitoring should be site specific. In addition to what already is required, BAR indicated the possible use of monthly pressure drop checks and quarterly fluorescent dye leak checks. Similar fabric filters could be grouped together with specific requirements.

Be aware that this comment does not just apply to this permit. This regulation was one of the issues with the draft objection for the ONEOK Glick compressor station permit around April of 2002. There were also inadequate monitoring and recordkeeping regarding control equipment. Comments have been made on several permits since then regarding this regulation. This comment is to be applied to all proposed T5 permits from here on out and also at renewals if not yet addressed.

3) * In sections N and O, on pages 36-38, there are requirements for the stated EU's from a July 24, 2000, construction permit. The requirements are to limit the hourly emission rate of PM10 to 3.2 lbs. per hour and to limit the hourly emission rate of PM to 5.5 lbs. per hour. These limitations are to reduce the PTE to below PSD significance levels. The 7/24/00 construction permit is unclear (on page 6) as to which specific EU's it is referring to. It addresses "belt conveyors, bucket elevators and ore bins" which are to have (we believe) performance testing for PM and opacity. At number three, it addresses "baghouses and bin vents" which are to have performance testing for PM and PM10 with the hourly limits mentioned above. Do all of these sources mentioned have hourly limits or just the "baghouses and bin vents?"

A letter from Mindy Bowman, dated May 18, 2001, to AeroMet Engineering, along with the chart on page 4 of the construction permit, seems to clarify what emission units are to be tested. The hourly limits for PM10 and PM apply to bin vents #1008, #1043, #1044, #1046 and baghouses #1034 and #1035. The EU's listed for sections N and O in the permit do not correspond to the EU's listed in Mindy's letter. It appears that the requirements for the EU's listed in Mindy's letter are not in the permit and they must be along with testing, monitoring and recordkeeping requirements. We are not sure if the EU's currently in sections N and O of the permit are subject to the hourly limits for PM10 and PM or not.

Please clarify which EU's from the construction permit have what requirements and make sure the correct EU's and their correct respective requirements are all in the proposed permit, along with appropriate monitoring and recordkeeping requirements.

Section N also has an NSPS OOO limit of 10% opacity for which there should be adequate monitoring and recordkeeping.

4) * In sections L and O, the EU's are subject to NSPS Subpart OOO. They are subject to, among other things, a PM limit of 0.05 g/dscm and a 7% opacity limit. How does one know that these EU's are in compliance? These are two different limits and they are not related. Section L has only monthly opacity observations and (2) Method 9's to be done per year. This monitoring is not adequate to insure compliance.

A lot of older NSPS standards, in general before 1990**,** did not require adequate monitoring or recordkeeping to insure compliance. When Part 70 came out, which required adequate monitoring to insure compliance, it called for "gapfilling" if there was insufficient monitoring. This was particularly meant for standards where there was no periodic testing, where there was no frequency specified and where there was only a one-time emission test. Additional testing, monitoring and recordkeeping were to be required to fill this gap.

Subpart OOO requires a one time test and no monitoring unless one has a wet scrubber. Additional monitoring and associated recordkeeping needs to be added. It would depend on if there is a stack, if there is control equipment or if the emissions are just fugitive. Both of the EU's in Section O and one in Section L have baghouses as control equipment. All three of these EU's are also listed in Section I. Monitoring/recordkeeping can be added to the baghouses as suggested in comment #2. One could then delete these EU's from Section I and just add any baghouse monitoring/recordkeeping here in Section O. At the BAR/EPA meeting, we talked about an initial testing using Method 5 for stacks and Method 9 or Method 22 for fugitive emissions. We also talked about periodic testing every five years or more frequent. A lot depends on the initial testing. If the initial testing shows a large margin of compliance, monitoring may be reduced. (If so, be sure to explain in the SoB) If the margin of compliance is small, more monitoring is indicated.

If there is a stack with no control equipment, additional monitoring can consist of more frequent performance tests or monitoring of any parameters established during the initial performance test. More frequent opacity observations could be done. If there is control equipment, in this case baghouses, monitoring can be done of the baghouses as mentioned above. If the EU's involve fugitives, more frequent opacity observations are in order along with more than two Method 9's per year.

5) * Section K has two emission units subject to NSPS OOO 15% opacity limit. Both of these units are included in Section I and have baghouses as control equipment. Monitoring and recordkeeping can be added to the baghouses as suggested in comment #2. One could then delete these EU's from Section I and just add any baghouse monitoring and recordkeeping here in Section K. The frequency of opacity observations could be increased.

Section M has ten emission units subject to NSPS OOO 10% opacity limit. Nine of these

units are included in Section I and have baghouses as control equipment. Monitoring and recordkeeping can be added to the baghouses as suggested in comment #2. One could then delete these EU's from Section I and just add any baghouse monitoring and recordkeeping here in Section M. The frequency of opacity observations could be increased.

EU-050 does not have control equipment or a stack. We assume any emissions would be fugitive. Monthly opacity readings are called for along with two Method 9's per year. There should be an initial performance test using Method 9. In order to comply with the NSPS 10% opacity limit (which is fairly low), more frequent opacity observations should be done. The frequency could be based on the results of the initial test. Weekly or even daily opacity observations may be called for. More Method 9's could be run, say quarterly. Any opacity monitoring and recordkeeping should be at a frequency to insure compliance with the NSPS OOO 10% opacity limit.

6) * On page 38, Section P, EU-049 (the maxigrinder) is required to meet NSPS OOO 15% opacity in the permit and is considered one emission unit. However, an inspection form in the permit package shows that the EU actually has four different components, i.e., a grinder, a hopper, a belt conveyor and an engine. The grinder itself has an NSPS 15% opacity requirement. However, the hopper and belt conveyor have an NSPS 10% opacity requirement. The engine has a 20% SIP opacity requirement. The permit must address all the components regarding opacity. They can be addressed separately or if the NSPS 10% opacity limit is addressed, this would in turn meet the 15% and 20% opacity limits. If this approach is taken, please explain in the SoB.

There is no control equipment and no stack. We assume any emissions would be fugitive. The permit calls for an initial performance test using Method 9. Thereafter, monthly opacity observations are called for along with two Method 9's per year. If the entire unit must meet the NSPS 10% opacity level (which is fairly low), more frequent opacity observations should be done. The frequency could be based on the results of the initial testing. Weekly or even daily opacity observations may be called for. More Method 9's could be run, say quarterly. The proposed permit currently calls for a 15% opacity limit. Depending on how BAR addresses this EU, in regard to the previous paragraph, this limit may vary. In any case, any opacity monitoring and recordkeeping should be at a frequency to insure compliance with the appropriate NSPS OOO opacity limit.

7) * In Section Q, on page 39, there are three EU's subject to opacity limits of 7% and the 7/24/00 construction permit is referenced. They <u>are not</u> subject to OOO in the proposed permit. They have CE-043 which is a baghouse. What is the difference between these "reclaim conveyors" and the "reclaim conveyors" in Section N which <u>are</u> subject to OOO?

The only limitation related to 7% opacity we could find in the 7/24/00 construction permit was from OOO at §60.672(a)(2). If these EU's are subject to §60.672(a)(2), would they not be subject to §60.672(a)(1) for PM also?

The limitation in Section Q states that these EU's are subject to the 7% opacity limit because they exhaust through the same vent as NSPS EU's, which would be CE-043 which is a baghouse (Section O). Even if they are not subject to OOO, as in the proposed permit, would they not also be subject to the 0.05 g/dscm PM limit also? If they are subject to one or both of these limits, they should have the same monitoring/recording requirements as stated in comment #4.

Note: Section Q is a good example of how different emission units with different limitations can all have the same control equipment. CE-043, a baghouse, is used in Sections A, I, N, O and Q. If the baghouse already has Monitoring and recordkeeping requirements in one section, how should those requirements be handled for the other sections? They could be repeated in each section or they could be deleted from one section and all combined in another specific section (if possible) or they could be referenced to another section or they could somehow be explained in the SoB. In any case, for EU's from sections K through S, one needs to somehow indicate if there are any monitoring and recordkeeping requirements for these EU's located in some other section in the permit or the requirements should be repeated in each section.

8) * In Section R, there are requirements from a construction permit referenced as July 28, 1995. It also states that there are three storage bins. We believe that the referenced
permit is one dated July 26,1995. Please verify which date is correct. The construction permit also mentions (5) finished product storage bins and the proposed permit mentions (3) bins. Which is correct?

The limit stated is a "maximum rate of 20 tons per hour." Elsewhere in the construction permit, it talks about numerous types of conveyors and buckets all rated at 20 tons per hour. Does the limit refer to the total limit for one conveyor to all the bins or does it refer to 20 tons per hour for each of several conveyors, one to each bin? The language could be more clear.

The throughput should be monitored and records kept to verify the maximum rate allowed. If there are no monitoring and recording requirements, the rationale should be explained in the SoB.

There are control devices (baghouses) on these storage bins. They have opacity 40% opacity requirements in Section D, control equipment requirements from Section I and process PM emissions from Section A. These EU's could be removed from those sections and added to Section R so all the requirements for these EU's are in one place. If not, Section R could reference sections I and D and explain that there are more

requirements. It could be explained in the SoB or the requirements could simply be duplicated wherever necessary.

9) * Section S involves (5) pan dryer emission units which are subject to NSPS Subpart UUU. There are specific NSPS PM and opacity requirements in parts two and three respectively. Subpart UUU calls for initial performance tests for PM (Method 5) and opacity (Method 9). A specific PM limit of 0.057 g/dscm is stated for dryers. An opacity limit of 10% is also required. All of the emission units have baghouses as control devices. There are no requirements except monthly opacity observations and two Method 9's per year.

Subpart UUU called for different kinds of monitoring depending on the type of dryers used. One also has to have a dry control device, which the source does, i.e., baghouses. However, the pan dryers used don't seem to fit in any category stated in (b) or (c), which seems to then revert to (a) which calls for the use of a COMS. BAR has submitted a letter, dated March 18, 2003, requesting an exemption from the opacity monitoring requirements at §60.734 for the (5) pan dryers. The request is based on language in the preamble to the final rule which says that EU's with potential PM emissions of less than 11 tons/year are exempt from the opacity monitoring requirements of Subpart UUU. It would be assumed that the pan dryers would fall under §60.734(c) even though "gypsum pan dryers" are not specifically listed. A previous similar ADI determination for Subpart UUU sets a precedent for approval. However, before approval, the source must document that the potential PM emissions for each of these EU's are currently below 11 tons/year. A permit condition must be included to require similar documentation at a certain ongoing frequency.

While the EU's may be exempt from any opacity monitoring requirements of Subpart UUU, they still would need to somehow monitor PM emissions to the level required at §60.732(a) in UUU. At §60.734(a), it refers to an EU that "uses a dry control device to comply with the mass emission standard." The initial emission test only is not adequate monitoring. There must be other monitoring such as periodic emission testing, parametric monitoring related to the initial emission test, monitoring of the baghouse controls as in comment #2 and so forth, along with appropriate recordkeeping. Also, the PM limit (0.057 g/dscm) is a concentration limit. There is a question as to how one would test for PM being that other air streams from other EU's are vented to the same control device. One must avoid dilution effects and PM contamination from the other streams. Note: This may be a problem also for other EU's at this source needing testing, where several different air streams are vented to the same control device.

There was also some discussion at the BAR/EPA meeting about steam in these stack/vents. It was a concern that the moisture would affect a COMS if it was used for monitoring purposes. The source has now requested an exemption for opacity monitoring in Subpart UUU. If approved, pending requested documentation, no COMS would be used and the steam would not be a factor. However, would this steam have an

effect on the efficiency of the baghouse?

The emission units (baghouses CE-019 and CE-031) are also subject to other monitoring and recordkeeping requirements per other regulations. Subpart OOO EU's are vented to CE-031 as in Sections L and M. Please refer to comment #4 and the types of monitoring/recordkeeping that can be used for OOO EU's. Both EU's are subject to the -501(d) requirements (and baghouse monitoring and recordkeeping as we discussed at the BAR/EPA meeting) at Section I. Both EU's are subject to SIP opacity limits(-031 at Section G and -019 at Section D). Both EU's are subject to SIP process PM emissions at Section A. Again, these control devices control emissions from several different rule requirements. The monitoring and recordkeeping requirements need to be cross referenced somehow as stated in the note to comment #7.

What about EU-019C and EU-019D (described as densite pan dryers) which also vent to CE-019? Should these also be under Section S?

10) In Section H, there are four IA's which are subject to 20% opacity referencing -650(a)(3). Should these be subject to K.A.R. 28-19-31(a) and (b)(2) for indirect heating equipment? If so, could this section be combined with Section B?

11) In Sections J through S, the normal "limit/standard - monitoring - R & R" format is not used. Based on our discussions and the potential changes to these sections, the format could and should be used.

12) Section J involves a steam boiler subject to NSPS Subpart Dc. Since the permit was proposed, BAR has submitted a letter, dated March 19, 2003, authorizing reduced recordkeeping and reporting per an EPA letter dated June 13, 1977. The EPA has not commented within the allotted 10 day period, so the authorization can be granted. As far as Section J, it should contain the relevant requirements as stated in the above referenced letter regarding §60.48c(g) and §60.48c(d). Numbers one and three already in Section J should be retained. The justification for reduced recordkeeping and reporting should be stated in Section J or in the SoB.

13) In number 13 of the SoB, starting on page 9, for this group of ~ 96 EU's, it does not say what opacity limit they are subject to. About 64 EU's are subject to 40% (page 27) and about 32 EU's are subject to 20% (page 30). They should be split out and listed under the appropriate % opacity.

The % opacity for the last two EU's (-001L and -041B) also is not listed. It should be 40% per section F.

14) In the SoB, number 18 needs to be rephrased. It now says that the source is <u>not subject</u> to Part 63 because HAP's emitted <u>exceed</u> major levels.

15) In the SoB, number 26 should list the dates of all the construction permits from which conditions are incorporated into the proposed permit along with a brief reference as to what the condition is and where it is found. There were more construction permits and conditions than the one that is listed.

16) * Under the Permit Shield section, on page 50, we would ask that BAR be consistent with Part 70 at §70.6(f)(3)(iii). In the second paragraph of Permit Shield section, please add a part (d) which is "The applicable requirements of the acid rain program, consistent with section 408(a) of the Act." This change should be made to the template so that all future permits include the change. Permits already issued should be updated at their renewal.

These are the initial formal EPA comments on the proposed Title V air operating permit for Georgia-Pacific Gypsum. These initial comments were previously sent electronically in draft final form to BAR with this letter being the official final hard copy. Although the comments should be the same, you will be notified of any significant changes. If there are any questions or if you wish to discuss any of these comments, please contact Gary Schlicht of my staff at (913)551-7097.

Sincerely,

Don Toensing, Chief
Air Permitting & Compliance Branch